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CAPLIN & DRYSDALE, CHARTERED James P. Wehner (admitted *pro hac vice*) Jeffrey A. Liesemer (admitted *pro hac vice*) One Thomas Circle, N.W., Suite 1100 Washington, D.C. 20005 Telephone: (202) 862-5000 jwehner@capdale.com jliesemer@capdale.com

Co-Counsel for the Official Committee of Asbestos Claimants

### UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

In re: Chapter 11

DURO DYNE NATIONAL CORP., et al., 1 : Case No. 18-27963-MBK

Debtors. : (Jointly Administered)

### FOURTH MONTHLY FEE STATEMENT OF CAPLIN & DRYSDALE, CHARTERED FOR THE PERIOD FROM FEBRUARY 1, 2019, THROUGH FEBRUARY 28, 2019

Caplin & Drysdale, Chartered ("Caplin & Drysdale" or the "Applicant"), counsel for the Official Committee of Asbestos Claimants (the "Committee"), hereby submits this fourth monthly fee statement<sup>2</sup> for the period commencing February 1, 2019, through February 28, 2019 (the "Fourth Fee Statement") pursuant to the Administrative Fee Order Establishing Certain Procedures for Allowance of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court, dated December 18, 2018 (Docket No. 345) (the "Interim Compensation Order").

The "**Debtors**" in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are Duro Dyne National Corp. (4664), Duro Dyne Machinery Corp. (9699), Duro Dyne Corporation (3616), Duro Dyne West Corp. (5943), and Duro Dyne Midwest Corp. (4662).

<sup>&</sup>lt;sup>2</sup> Caplin & Drysdale's first monthly fee statement was also filed as an interim fee application under the title *First Interim Fee Application of Caplin & Drysdale, Chartered for Allowance of Fees and Reimbursement of Expenses* on December 14, 2018 (Docket No. 337).

Pursuant to the Interim Compensation Order, responses to the Second Fee Statement, if any, are due by April 4, 2019.

Dated: March 25, 2019 By: /s/ James P. Wehner

James P. Wehner, Esq. (admitted *pro hac vice*)
Jeffrey A. Liesemer, Esq. (admitted *pro hac vice*)
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Counsel to the Official Committee of Asbestos Claimants

### UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

#### D.N.J. LBR 2016-1, FEE APPLICATION COVER SHEET

Debtor: Duro Dyne National Corp., et al. 1 Applicant: Caplin & Drysdale, Chartered

Case No.: 18-27963 (MBK) Client: Official Committee of

**Asbestos Claimants** 

Chapter: 11 Case Filed: September 7, 2018

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION UNDER PENALTY OF PERJURY, PURSUANT TO 28 U.S.C. SECTION 1746

#### RETENTION ORDER(S) ATTACHED AS EXHIBIT B

### FOURTH MONTHLY FEE STATEMENT<sup>2</sup> OF CAPLIN & DRYSDALE, CHARTERED FOR THE PERIOD FROM FEBRUARY 1, 2019, THROUGH FEBRUARY 28, 2019

#### **SECTION 1 FEE SUMMARY FEES EXPENSES** TOTAL PREVIOUSLY REQUESTED \$612,145.25 \$13,458.43 TOTAL ALLOWED TO DATE \$462,481.75 \$8,822.27 TOTAL RETAINER (IF APPLICABLE)<sup>3</sup> \$0.00 \$0.00 TOTAL HOLDBACK (IF APPLICABLE) \$0.00 \$0.00 TOTAL RECEIVED BY APPLICANT \$375,557.85 \$7,543.25 FEE TOTALS – PAGE 2 \$165,249.50 \$2,242.43 DISBURSEMENTS TOTALS - PAGE 3 \$167,491.93 TOTAL FEE APPLICATION MINUS 20% HOLDBACK \$33,049.90 AMOUNT SOUGHT AT THIS TIME \$134,442.03

The "**Debtors**" in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are Duro Dyne National Corp. (4664), Duro Dyne Machinery Corp. (9699), Duro Dyne Corporation (3616), Duro Dyne West Corp. (5943), and Duro Dyne Midwest Corp. (4662).

<sup>&</sup>lt;sup>2</sup> Caplin & Drysdale's first monthly fee statement was also filed as an interim fee application under the title *First Interim Fee Application of Caplin & Drysdale, Chartered for Allowance of Fees and Reimbursement of Expenses* on December 14, 2018 (Docket No. 337).

As disclosed in its Retention Application, Caplin & Drysdale holds a retainer left over from prepetition services in the amount of \$12,115.90 (the "Retainer"). While the Retainer has not yet been applied to amounts requested under its fee applications to date, the total amount received reflects that Caplin & Drysdale has been paid less than requested amounts in the amount of the Retainer.

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED	HOURS	RATE	FEE
Ann C. McMillan, Member	1984	15.7	\$840	\$13,188.00
Kevin C. Maclay, Member	1994	12.6	\$775	\$9,765.00
Jeffrey A. Liesemer, Member	1995	55.8	\$735	\$41,013.00
James P. Wehner, Member	1993	123.6	\$735	\$90,846.00
Jeanna Rickards Koski, Of Counsel	2005	13.9	\$565	\$7,853.50
Kevin M. Davis, Associate	2010	2.4	\$505	\$1,212.00
Brigette A. Wolverton, Paralegal	N/A	4.9	\$280	\$1,372.00
TOTAL FEES		228.9		\$165,249.50
ATTORNEY BLENDED RATE			\$721.93	

#### SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
(.01) Asset Analysis and Recovery	10.9	\$8,011.50
(.03) Business Operations	0.0	\$0.00
(.04) Case Administration	0.0	\$0.00
(.05) Claims Administration and Objections	0.0	\$0.00
(.07) Fee Applications-Self	0.5	\$367.50
(.09) Financing	0.0	\$0.00
(.10) Litigation	6.7	\$4,597.50
(.11) Plan and Disclosure Statement	210.1	\$151,891.00
(.12) Relief from Stay Proceedings	0.0	\$0.00
(.13) Tax Issues	0.0	\$0.00
(.15) Committee Meetings/Conferences	0.4	\$298.00
(.16) Travel Time	0.0	\$0.00
(.17) Docket Review & File Maintenance	0.0	\$0.00
(.18) Fee Applications-Others	0.3	\$84.00
(.19) Retention Applications-Others	0.0	\$0.00
(.20) Retention Applications-Self	0.0	\$0.00
(.22) Review Fee Application-Other Parties	0.0	\$0.00
SERVICE TOTALS:	228.9	\$165,249.50

#### SECTION III SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
Computer Assisted Legal Research	\$337.28
Conference Call Charges	\$0.00
Courier & Express Carriers	\$0.00
Court Reporting	\$1,585.40
Fax	\$0.00
Filing Fees	\$0.00
Other Research	\$0.00
Pacer Fees	\$0.00
Postage	\$1.65
Reproduction Services - In-house	\$31.70
Reproduction Services - Outside	\$0.00
Travel	\$256.79
Other (specify): eDiscovery platform, meals	\$29.61
DISBURSEMENTS TOTAL:	\$2,242.43

#### SECTION IV CASE HISTORY

(NOTE: Items 3 - 6 are not applicable to applications under 11 U.S.C. § 506)

- (1) DATE CASE FILED: September 7, 2018
- (2) CHAPTER UNDER WHICH CASE WAS COMMENCED: 11
- (3) DATE OF RETENTION: November 8, 2018, effective as of September 26, 2018 [Docket No. 258]. See Order attached.
- (4) SUMMARIZE IN BRIEF THE BENEFITS TO THE ESTATE AND ATTACH SUPPLEMENTS AS NEEDED:
  - a) Caplin & Drysdale analyzed and briefed objections to the Plan, reviewed Planrelated insurance issues with special insurance counsel, and developed strategies for the Plan and related materials;
  - b) Caplin & Drysdale analyzed issues relating to temporary allowance of certain claims for voting purposes;
  - c) Caplin & Drysdale assisted with a mediation related to insurance issues;
  - d) Caplin & Drysdale spent time communicating with Committee members and preparing memoranda and other materials for Committee members;

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- e) Caplin & Drysdale prepared and filed its monthly fee application;
- f) Caplin & Drysdale assisted in the preparation of fee applications for other Committee professionals;
- g) Caplin & Drysdale spent time working with counsel for the other Plan proponents and internally on general case matters, hearings, and status issues, as well as organizing and maintaining the case filing system and docket review for the bankruptcy case;
- h) Caplin & Drysdale performed other professional services as counsel for the Committee as necessary and appropriate in these chapter 11 cases.
- (5) ANTICIPATED DISTRIBUTION TO CREDITORS:
  - (A) ADMINISTRATION EXPENSES: (unknown at this time)
  - (B) SECURED CREDITORS: (unknown at this time)
  - (C) PRIORITY CREDITORS: (unknown at this time)
  - (D) GENERAL UNSECURED CREDITORS: (unknown at this time)
- (6) FINAL DISPOSITION OF CASE AND PERCENTAGE OF DIVIDEND PAID TO CREDITORS (IF APPLICABLE): Final disposition of case and dividend are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: March 25, 2019 /s/ James P. Wehner
Signature

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## EXHIBIT A



One Thomas Circle NW, Suite 1100
Washington, DC 20005
Telephone: (202) 862-5000
Federal Tax I.D. No.: 52-1226629

www.capdale.com

Official Committee of Asbestos Claimants of Duro Dyne National

March 25, 2019

Invoice #: 318341 Page: 1

Fax: (202) 429-3301

RE: Duro Dyne Bankruptcy

For Professional Services Rendered Through February 28, 2019

SERVICES					
Date	Person	Description of Services	Hours	Rate	Amount
.01 Asset	Analysis	& Recovery			
2/1/2019	JAL	Review, analysis, and comments on draft insurance agreement.	0.7	\$735.00	\$514.50
2/4/2019	JAL	Revisions and editing to draft insurance agreement.	3.6	\$735.00	\$2,646.00
2/5/2019	JAL	Review and comment on revised drafts of insurance agreement.	4.0	\$735.00	\$2,940.00
2/6/2019	JAL	Confer with JPW re insurer's mediation proposal.	0.2	\$735.00	\$147.00
2/7/2019	JAL	Email correspondence with J. Prol re insurer's mediation request (0.2); teleconference with JPW, Debtors' counsel, FCR's counsel, and insurance counsel re same and next steps (0.7).	0.9	\$735.00	\$661.50
2/19/2019	JAL	Review and comments on draft motion to approve insurance agreement (0.6); email correspondence with J. Prol and E. Grim re comments on draft motion to approve insurance agreement (0.2).	0.8	\$735.00	\$588.00
2/22/2019	JAL	Review and comments draft motion to seal insurance agreement and related documents.	0.2	\$735.00	\$147.00
2/27/2019	JAL	Review and comments on marked up insurance agreement.	0.5	\$735.00	\$367.50
		 Total	10.90		\$8,011.50
.07 Fee A	pplication	s-Self			
2/22/2019	JPW	Review draft fee application (0.3); meet with CG re monthly fee application (0.2).	0.5	\$735.00	\$367.50
		 Total	0.50		\$367.50

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SERVICES					
Date	Person	Description of Services	Hours	Rate	Amount
.10 Litiga	tion				
2/1/2019	JPW	Emails re insurance issues.	0.5	\$735.00	\$367.50
2/8/2019	JAL	Review and analysis of bench decision re Rule 3018 motion and draft and revise correspondence re same (0.6); confer with JPW re same and upcoming mediation (0.1); review confirmation objections (0.2).	0.9	\$735.00	\$661.50
2/8/2019	JPW	Emails re litigation issues (1.7); meet with KCM re litigation issues (0.3).	2.0	\$735.00	\$1,470.00
2/8/2019	KCM	Meet with JPW re case status, tasks and strategy.	0.3	\$775.00	\$232.50
2/8/2019	KCM	Review/analyze materials re appeals issues.	1.1	\$775.00	\$852.50
2/8/2019	KCM	Meet with KMD re appeal issues.	0.2	\$775.00	\$155.00
2/8/2019	KMD	Discuss UST appeal from FCR appointment w/ KCM.	0.2	\$505.00	\$101.00
2/11/2019	KMD	Review UST appeal filing re FCR appointment (.5); research related issues (1.0).	1.5	\$505.00	\$757.50
		 Total	6.70		\$4,597.50
.11 Plan 8	& Disclosu	re Statement			
2/1/2019	ACM	Review insurance agreement.	0.3	\$840.00	\$252.00
2/6/2019	ACM	Exchange e-mails re insurance agreement.	0.1	\$840.00	\$84.00
2/6/2019	JPW	Emails re insurance issues (0.3); meet with JAL re insurance issues (0.3).	0.6	\$735.00	\$441.00
2/7/2019	ACM	Exchange e-mails re insurance issues.	0.1	\$840.00	\$84.00
2/7/2019	JPW	Teleconference Debtor, FCR, insurance counsel re insurance issues (0.8); memo to Committee; emails re same (0.5); emails re insurance issues (0.5).	1.8	\$735.00	\$1,323.00
2/8/2019	ACM	Exchange e-mails re billing guidelines (.1); exchange e-mails re objections (.1).	0.2	\$840.00	\$168.00
2/9/2019	JAL	Review and analysis of confirmation objections.	2.7	\$735.00	\$1,984.50
2/10/2019	JAL	Further review and analysis of confirmation objections.	2.4	\$735.00	\$1,764.00
2/11/2019	JAL	Analysis of confirmation objections and review of related materials (5.3); conferences with JPW re same (0.9); conference with KMD re same (0.2).	6.4	\$735.00	\$4,704.00
2/11/2019	JPW	Review Plan objections (2.5); meet with KCM re plan objections x2 (0.5); meet with JAL re plan objections (0.5).	3.5	\$735.00	\$2,572.50
2/11/2019	KCM	Meet with JPW re confirmation issues.	0.3	\$775.00	\$232.50
2/11/2019	KCM	Review/analyze briefs and materials re confirmation issues.	2.7	\$775.00	\$2,092.50

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SERVICES					
Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan	& Disclosu	re Statement			
2/12/2019	JAL	Confer with JRK re insurers' objections to confirmation (0.2); review and analysis of confirmation objections and related materials (5.0); telephone calls with JRK re same (0.4).	5.6	\$735.00	\$4,116.00
2/12/2019	JPW	Research and draft insert for confirmation brief.	2.3	\$735.00	\$1,690.50
2/12/2019	KCM	Meet with JRK re confirmation issues.	0.1	\$775.00	\$77.50
2/12/2019	BAW	Research, select, and prepare confirmation materials for attorney review.	2.1	\$280.00	\$588.00
2/13/2019	JAL	Further review and analysis of materials in connection with preparing response to plan objections (6.1); teleconference with JPW, KCM, Debtors' counsel, FCR counsel, and insurance recovery counsel re same (0.6); review and analysis of materials in prep for conference call with Plan Proponents re same (0.4); confer with JPW and KCM re same (0.3).	7.4	\$735.00	\$5,439.00
2/13/2019	JPW	Teleconference Debtor, FCR re confirmation (0.6); meet with JAL and KCM re confirmation (0.3).	0.9	\$735.00	\$661.50
2/13/2019	JPW	Research and draft objection response.	3.7	\$735.00	\$2,719.50
2/13/2019	KCM	Review/analyze confirmation, objections and related materials and plan/prepare next steps.	1.1	\$775.00	\$852.50
2/13/2019	KCM	Teleconference with Debtor, FCR, JPW and JAL re confirmation issues.	0.6	\$775.00	\$465.00
2/13/2019	KCM	Meet with JPW and JAL re confirmation issues.	0.3	\$775.00	\$232.50
2/13/2019	JRK	Research questions for response to insurer objections to confirmation.	2.7	\$565.00	\$1,525.50
2/14/2019	JAL	Email correspondence with JRK re issues relating to confirmation objections (0.5); analysis of confirmation objections in connection with preparing plan proponents' response (7.2).	7.7	\$735.00	\$5,659.50
2/14/2019	JPW	Research and draft confirmation response.	3.6	\$735.00	\$2,646.00
2/14/2019	JRK	Research questions for response to insurer	3.7	\$565.00	\$2,090.50

6.1

3.7

1.2

\$735.00

\$735.00

\$775.00

\$4,483.50

\$2,719.50

\$930.00

objections to confirmation.

confirmation objections (0.2).

and briefs re confirmation issues.

response.

2/15/2019

2/15/2019

2/15/2019

JAL

JPW

KCM

Further review and analysis of materials in

Research and draft confirmation objection

Review/analyze UST and proposed materials

connection with preparing response to confirmation objections (5.4); review and analysis of correspondence from UST re confirmation objections and follow-up demands, and confer with JPW re same (0.5); review and analysis of memo from JRK re issues relating to

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SERVICES					
Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan 8	Disclosu	re Statement			
2/15/2019	JRK	Research questions for response to insurer objections to confirmation.	2.9	\$565.00	\$1,638.50
2/16/2019	JRK	Research questions for response to insurer objections to confirmation.	4.6	\$565.00	\$2,599.00
2/17/2019	JAL	Correspondence with JRK re issues relating to confirmation objections and research (0.4); draft and revise response brief to confirmation objections (4.0).	4.4	\$735.00	\$3,234.00
2/18/2019	ACM	Review draft response to UST Objection.	0.3	\$840.00	\$252.00
2/18/2019	JAL	Further drafting and revisions to brief in response to confirmation objections (8.2); telephone call with JPW re confirmation objections and upcoming mediation with objecting insurer (0.1); email exchanges with JRK re research re issues relating to confirmation objections (0.2).	8.5	\$735.00	\$6,247.50
2/18/2019	JPW	Emails re plan, insurance issues (0.8); teleconference JAL re insurance issues (0.3).	1.1	\$735.00	\$808.50
2/18/2019	JPW	Research and draft response paper.	3.9	\$735.00	\$2,866.50
2/18/2019	KCM	Review/edit draft brief and related materials re confirmation issues.	2.1	\$775.00	\$1,627.50
2/19/2019	ACM	Exchange e-mails re TDP (.1); review same (.2); review draft response to UST objection (.3).	0.6	\$840.00	\$504.00
2/19/2019	JAL	Further drafting and revisions to response brief re confirmation objections.	6.3	\$735.00	\$4,630.50
2/19/2019	JPW	Teleconference K. Quinn re insurance issues (0.2); emails re plan issues, insurance issue (0.8).	1.0	\$735.00	\$735.00
2/19/2019	JPW	Research confirmation issues, confirmation brief.	2.5	\$735.00	\$1,837.50
2/20/2019	JAL	Further drafting and revisions of response brief re confirmation objections.	8.2	\$735.00	\$6,027.00
2/21/2019	JAL	Review of UST's amended exhibit to confirmation objections (0.2); further drafting and revisions to brief in response to confirmation objections (7.8).	8.0	\$735.00	\$5,880.00
2/22/2019	ACM	Exchange e-mails re briefing issues (.1); conference FCR counsel re same (.4).	0.5	\$840.00	\$420.00
2/22/2019	JAL	Revisions and editing to brief in response to confirmation objections (2.6); telephone call with JPW re confirmation brief and next steps (0.1); office conference with JPW re confirmation brief and next steps (0.2); email correspondence with J Prol and E Grim re prep for confirmation hearing (0.2); review and edits to draft of combined confirmation brief (1.0).	4.1	\$735.00	\$3,013.50

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SERVICES					
Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan 8	Disclosu	re Statement			
2/22/2019	JPW	Teleconference J. Sinclair re confirmation issues (0.4); teleconference J. Prol re confirmation briefs (0.3); draft and research response brief (4.2); meet with KCM re draft brief (0.8); emails re confirmation brief (0.9).	6.6	\$735.00	\$4,851.00
2/22/2019	KCM	Review/edit section of confirmation brief and review/analyze related materials.	1.7	\$775.00	\$1,317.50
2/22/2019	KCM	Meet with JPW re confirmation issues.	8.0	\$775.00	\$620.00
2/23/2019	ACM	Review draft brief (1.7); revise same (.8); exchange e-mails re same (.1); exchange e-mails re Cooperation Agreement (.2).	2.8	\$840.00	\$2,352.00
2/23/2019	KMD	Research issue re response to insurer confirmation objections (0.6); correspond w/ JAL re same (0.1).	0.7	\$505.00	\$353.50
2/24/2019	ACM	Exchange e-mails re draft brief and Cooperation Agreement.	0.2	\$840.00	\$168.00
2/24/2019	JAL	Telephone call with JPW re comments on draft confirmation brief and next steps (0.2); review of comments and edits on confirmation brief (2.1); further drafting and revisions to confirmation brief (2.9).	5.2	\$735.00	\$3,822.00
2/24/2019	JPW	Revise confirmation brief (5.1); research for confirmation brief (2.6); emails re confirmation brief (0.7); teleconference JAL re confirmation brief (0.3).	8.7	\$735.00	\$6,394.50
2/25/2019	ACM	Review brief (1.1); teleconference JPW, JAL re same (.1); teleconference KCM re same (.1); exchange e-mails re same (.3); review and revise Cooperation Agreement (.5); exchange e-mails re same (.1).	2.2	\$840.00	\$1,848.00
2/25/2019	JAL	Revisions and editing to confirmation brief (10.6); telephone call with J Prol re draft confirmation brief (0.1); telephone call with ACM and JPW re confirmation brief and next steps (0.1); review of draft Podgainy certification (0.3).	11.1	\$735.00	\$8,158.50
2/25/2019	JPW	Review and revise brief insert (2.7); emails re confirmation brief (0.8); teleconference ACM, JAL re trust issues (0.2).	3.7	\$735.00	\$2,719.50
2/26/2019	ACM	Revise Cooperation Agreement (.3); exchange e-mails re same (.1); exchange e-mails re brief (.1); review same (.5); exchange e-mails re TDP (.4); exchange e-mails re insurance agreement (.2).	1.6	\$840.00	\$1,344.00

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SERVICES					
Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan 8	k Disclosu	re Statement			
2/26/2019	JAL	Revisions and editing to confirmation brief (4.8); correspondence with ACM and plan parties and confer with Guerrero re changes to confirmation brief (0.3); review of correspondence from ACM and E. Harron re TDP matters (0.2); review and comment on draft declaration of FCR in support of confirmation (1.0); draft and revise memo to plan group re confirmation brief (0.3); analysis in prep for confirmation hearing (1.7).	8.3	\$735.00	\$6,100.50
2/26/2019	JPW	Emails re confirmation briefing.	0.5	\$735.00	\$367.50
2/27/2019	ACM	Conference JPW, JAL re confirmation objection and related issues (.5); teleconference JPW, JAL, Debtor counsel, FCR counsel and insurance counsel re same (.9); exchange e-mails re insurance agreement (.2); exchange e-mails re insurance agreement (.2); review TDP and circulate description of proposed changes (.8).	2.6	\$840.00	\$2,184.00
2/27/2019	JAL	Review and analysis of materials in prep for confirmation hearing (2.1); office conference with ACM and JPW re upcoming confirmation hearing and preparation (0.6); teleconference with ACM, JPW, and counsel for other plan parties re prep for confirmation hearing and related issues (0.9); second office conference with ACM and JPW re prep for confirmation hearing and related issues (0.1); draft and revise memo to plan group re confirmation hearing and related issues (0.8).	4.5	\$735.00	\$3,307.50
2/27/2019	JPW	Meet with JAL re confirmation issues (0.3); emails re confirmation issues (0.5);meet with ACM and JAL re confirmation issues (0.8); teleconference FCR, Debtors re confirmation issues (0.9).	2.5	\$735.00	\$1,837.50
2/27/2019	BAW	Research and prepare cases and materials re upcoming hearing re second amended PoR.	2.3	\$280.00	\$644.00
2/28/2019	ACM	Teleconference S. Kohut re Trust issue (.1); teleconference KCM re Plan amendments (.1); exchange e-mails re TDP issues (.3); revise insurance agreement (.5); revise Release (.8); revise TDP and Trust Agreement (1.8); review Plan (.6).	4.2	\$840.00	\$3,528.00
2/28/2019	JAL	Correspondence with J. Prol, K. Quinn, and J. Fialcowitz re insurance-related plan issues (0.4); draft and revise correspondence re confirmation hearing prep (0.2); draft and revise amendments to Plan and TDP (2.3); review and analysis of motion to extend exclusivity periods (0.3); drafting and revisions to proposed confirmation order (1.0); review and analysis of revised trust agreement and TDP (0.4).	4.6	\$735.00	\$3,381.00
2/28/2019	JPW	Emails re confirmation issues.	1.1	\$735.00	\$808.50

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SERVICE	S					
Date	Person	Description (	of Services	Hours	Rate	Amount
.11 PI	an & Disclosu	ire Statement				
2/28/2019	9 JPW	Review plan o	documents.	0.9	\$735.00	\$661.50
2/28/2019	9 JPW	Meet with JAI	re confirmation hearing.	0.2	\$735.00	\$147.00
2/28/2019	9 BAW		ial research re PoR and prepare attorney review.	0.2	\$280.00	\$56.00
			Total	210.10		\$151,891.00
.15 Co	ommittee Mee	tings/Conferen	ces			
2/7/2019	JAL	Review and c Committee.	omment on JPW's draft memo to	0.1	\$735.00	\$73.50
2/18/2019	9 JAL	Review and c Committee.	omment on JPW's draft memo to	0.1	\$735.00	\$73.50
2/18/2019	9 KCM	Review Comr	nittee memo.	0.1	\$775.00	\$77.50
2/19/2019	9 JAL	Review of K.	Quinn's report to the Committee.	0.1	\$735.00	\$73.50
			Total	0.40		\$298.00
.18 Fe	e Application	s-Others				
2/25/2019	9 BAW		C monthly fee application and conciliation chart.	0.3	\$280.00	\$84.00
			Total	0.30		\$84.00
			Total Professional Services	228.9		\$165,249.50
PERSON	IRECAP					
Person			Title	Hours	Rate	Amount
JAL	Jeffrey A. Lie	esemer	Member	123.6	\$735.00	\$90,846.00
KCM	Kevin C. Mad	clay	Member	12.6	\$775.00	\$9,765.00
ACM	Ann C. McMi	llan	Member	15.7	\$840.00	\$13,188.00
JPW	James P. We	ehner	Member	55.8	\$735.00	\$41,013.00
JRK	Jeanna Rick	ards Koski	Of Counsel	13.9	\$565.00	\$7,853.50
KMD	Kevin M. Dav	/is	Associate	2.4	\$505.00	\$1,212.00
BAW	Brigette A. W	/olverton	Paralegal	4.9	\$280.00	\$1,372.00
DISBUR	SEMENTS					
Date	Descrip	tion of Disburs	ements			Amount
02/08/20	19 Epiq eDi	scovery Solution	ns - Services for Dec. 2018 [.01]			\$2.28
02/13/20	19 Photoco <sub>l</sub>	oies [.11]				\$5.70
02/14/20	19 Trvl Exp		portation r/t to Union Station for 2/1/1	9 hrg		\$34.18

(JPW). [.01]

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318341

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#### DISBURSEMENTS

Date	Description of Disbursements	Amount
02/19/2019	Court Reporting/Transcript Service - Expedited transcript re Scarcella depo. [.01]	\$1,585.40
02/25/2019	Photocopies (Color) [.11]	\$26.00
02/26/2019	Local Transportation - DC - 1/3/19 OT from office to home (CG). [.11]	\$86.76
02/26/2019	OT Meals- Working dinner for CG. [.11]	\$15.98
02/26/2019	OT Meals- Working dinner for CG. [.10]	\$9.07
02/28/2019	Epiq eDiscovery Solutions - Services for Jan. 2019 [.01]	\$2.28
02/28/2019	Database Research - Westlaw JPW - Feb 12-18, 2019 [.01]	\$91.48
02/28/2019	Database Research - Westlaw CMG - Feb 26, 2019 [.01]	\$33.72
02/28/2019	Database Research - Westlaw JAL - Feb 11-25, 2019 [.01]	\$210.08
02/28/2019	Database Research - Lexis BAW- Feb 27, 2019 [.01]	\$2.00
02/28/2019	Postage [.01]	\$1.65
02/28/2019	Trvl Exp - Ground Transportation 02/26 - 02/28/19 DC to Davidsonville, MD. [.16]	\$135.85 
	Total Disbursements	\$2,242.43

## EXHIBIT B

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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1

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Proposed Local Counsel for the Official Committee of Asbestos Claimants Order Filed on November 9, 2018 by Clerk U.S. Bankruptcy Court District of New Jersey

### UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

In re: : Chapter 11

DURO DYNE NATIONAL CORP., et al., : Case No. 18-27963 (MBK)

Debtors.<sup>1</sup> : (Jointly Administered)

# [PROPOSED] ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF CAPLIN & DRYSDALE, CHARTERED, AS THE COMMITTEE'S COUNSEL, EFFECTIVE NUNC PRO TUNC AS OF SEPTEMBER 26, 2018

The relief set forth on the following pages, numbered two (2) through and including three (3), is hereby **ORDERED**.

DATED: November 9, 2018

Honorable Michael B. Kaplan United States Bankruptcy Judge Case 18-27963-MBK Doc 288 Filed 03/29/19 Entered 03/29/19 13:00:05 Desc Main Doorment Plage 28 of 39

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Debtor: Duro Dyne National Corp., et al.

Case No.: 18-27963 (MBK)

Caption: Order Authorizing the Employment and Retention of Caplin & Drysdale, Chartered, as the

Committee's Counsel, Effective Nunc Pro Tunc as of September 26, 2018

Before this Court is the Application of the Official Committee of Asbestos Claimants for an Order Authorizing the Employment and Retention of Caplin & Drysdale, Chartered, as the Committee's Counsel, Effective Nunc Pro Tunc as of September 26, 2018 (the "Application"), which was filed by the Official Committee of Asbestos Claimants (the "Committee") on October 29, 2018. Based on the record herein, and after due deliberation thereon, this Court finds and concludes that (i) the law firm of Caplin & Drysdale, Chartered ("Caplin & Drysdale"), does not represent any entity having an interest adverse to the Committee or to the asbestos-related creditors of the Debtors' estates in connection with the matters for which the Committee proposes to employ Caplin & Drysdale; (ii) Caplin & Drysdale is a "disinterested person" pursuant to §§ 101(14) and 328(c) of the Bankruptcy Code; (iii) proper and adequate notice of the Application has been given and no other or further notice is necessary; and (iv) the Committee's employment and retention of Caplin & Drysdale as its counsel should be approved. Accordingly, IT IS HEREBY ORDERED, that:

- 1. The Application is granted and approved;
- 2. The Committee is authorized to employ and retain Caplin & Drysdale as its counsel on the terms set forth in the Application, pursuant to §§ 328 and 1103 of the Bankruptcy Code, effective *nunc pro tunc* as of September 26, 2018;
- 3. Caplin & Drysdale shall be compensated in accordance with the procedures set forth in §§ 330 and 331 of the Bankruptcy Code, the applicable Federal Rules of Bankruptcy Procedure, the orders and rules of this Court, and such other procedures as may be fixed by order of this Court;

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Debtor: Duro Dyne National Corp., et al.

Case No.: 18-27963 (MBK)

Caption: Order Authorizing the Employment and Retention of Caplin & Drysdale, Chartered, as the

Committee's Counsel, Effective Nunc Pro Tunc as of September 26, 2018

4. The requirement set forth in Local Rule 9013-1(a)(3) that any motion or other request for relief be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Application or otherwise waived;

- 5. This Order shall be immediately effective and enforceable upon its entry; and
- 6. The Court shall retain jurisdiction with respect to all matters arising or related to the implementation of this order.